

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re

STREAM TV NETWORKS, INC.,

Debtors.

Chapter 11

Case No.: 23-10763 (AMC)
(Jointly Administered)¹

NOTICE OF ORAL DEPOSITION *DUCES TECUM*

PLEASE TAKE NOTICE that Visual Semiconductor, Inc. (“VSI”) by and through their undersigned counsel, pursuant to Rules 30(b)(6) and 45 of the Federal Rules of Civil Procedure, as made applicable by Rule 7030 of the Federal Rules of Bankruptcy Procedure, will take the oral deposition of the designee or designee(s) of Hawk Investments Holding Ltd ("Hawk" and/or the "Deponent"), in connection with case, on **October 30, 2024 at 10:00 a.m. (Eastern Time)** and will continue day to day until completed or adjourned by mutual consent of the parties, at the law office of **Akerman LLP, 222 Delaware Avenue, Suite 1710, Wilmington, Delaware 19801**. The deposition will be conducted under oath before a certified court reporter, recorded stenographically and may be videotaped.

PLEASE TAKE FURTHER NOTICE that the Deponent must designate one or more persons to testify on behalf of the deponent, with regard to all matters known or reasonably available to the deponent on the matters set forth on **Schedule "A"** attached hereto. VSI requests that the deponent provide, as soon as reasonably possible, a written designation of the name(s) and position(s) of the persons who consent to testify on behalf of the deponent.

¹ On April 11, 2023, the Court entered an order directing joint administration of the above-captioned case and *In re Technovative Media, Inc.*; Case No. 23-10764 (AMC). (D.I. #81).

Hawk is to testify as to the following topics:

LIST OF TOPICS

1. Hawk's relationship with SSG.
2. The appointment of the Trustee.
3. Hawk's communications and dealings with the Trustee.
4. Hawk's and/or its agent(s)' influence or control over the Debtors, the Debtors' assets, this case, or the Trustee.
5. All amounts Hawk has paid to the Trustee and/or the Debtors' estates.
6. Hawk's and/or other parties' ability to fund the amounts owed under the Sharing and Carve Out Agreement [ECF No. 630-1] ("9019 Settlement").
7. Communications regarding SSG and the Trustee.
8. Location of the Debtors' assets.
9. Use by Hawk and other non-Debtor parties of the Debtors' assets, including intellectual property.
10. Hawk's communications with current or prospective investors in the Debtors' assets.

PLEASE TAKE FURTHER NOTICE that the Deponent is further requested to produce all documents described on the attached Schedule "A." In order to expedite the deposition, please deliver via electronic transmission, copies of the documents, electronically stored information, or objects described in the attached "Schedule A" to the undersigned counsel at the Austin, Texas address or via email to adam.swick@akerman.com on or before **October 24, 2024**.

[Remainder of page intentionally left blank]

Dated: October 11, 2024

Respectfully submitted,

AKERMAN LLP

/s/ R. Adam Swick

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Attorneys for Visual Semiconductor, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 11, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on this day by transmission of Notices of Electronic Filing generated by CM/ECF to those parties registered to receive electronic notices of filing in this case, and via email to the following parties as follows:

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/s/ R. Adam Swick

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